

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re
AMR CORPORATION,
Debtor.

CAROLYN FJORD, *et al.*,
Plaintiffs-Appellants
v.
AMR CORPORATION, *et al.*,
Defendants-Appellees.

21-cv-02163-KPF

Case No. 11-15463 (SHL)

Adv. Case No. 13-1392 (SHL)

**APPELLEE MERGED ENTITY AMERICAN AIRLINES GROUP INC.'S
NOTICE OF CONSENT MOTION TO SUPPLEMENT THE RECORD ON APPEAL**

PLEASE TAKE NOTICE that, upon the attached Declaration of Robin L. Gushman, sworn to on June 22, 2021, the undersigned will move before the Honorable Katherine Polk Failla, Judge of the United States District Court for the Southern District of New York, at the Thurgood Marshall United States District Courthouse, located at 40 Foley Square, New York, NY 10007, at a time and place to be scheduled by this Court, for an order to supplement the record on appeal pursuant to Federal Rule of Bankruptcy Procedure 8009(e)(2).

The parties have conferred and Plaintiffs-Appellants consent to the inclusion of the following six documents—true and correct copies of which are attached as Exhibits 1 through 6 to the Declaration of Robin L. Gushman—within the official record of this Court and thereby in the certified record on appeal:

- **Exhibit 1:** Plaintiffs' Memorandum in Support of Motion for Leave to File Second Amended and Supplemental Complaint and to Add Damages Claim and Demand for

Jury Trial (Adv. Dkt. 105-1)¹

- **Exhibit 2:** Plaintiffs' Memorandum in Support of Amended Motion for Leave to File a Second Amended and Supplemental Complaint and to Add Damages Claim and Demand for Jury Trial (Adv. Dkt. 106-1)
- **Exhibit 3:** Plaintiffs' Memorandum in Support of Motion for Leave to File Second Amended and Supplemental Complaint to Add Damages Claim and Demand for Jury Trial (Adv. Dkt. 118-1)
- **Exhibit 4:** Scheduling Order (Adv. Dkt. 188)
- **Exhibit 5:** Memorandum of Law in Support of Plaintiffs' Motion for Leave to File a Second Amended and Supplemental Complaint to Allege Injury and Damages Under Section 4 of the Clayton Act and Demand for Jury Trial (Adv. Dkt. 190)
- **Exhibit 6:** Reply Memorandum in Support of Plaintiffs' Motion for Leave to File a Second Amended and Supplemental Complaint to Allege Injury and Damages Under Section 4 of the Clayton Act and Demand for Jury Trial (Adv. Dkt. 204)

Dated: June 22, 2021
Orinda, California

Respectfully Submitted,

LATHAM & WATKINS LLP

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American Airlines Group Inc.*

¹ "Adv. Dkt." refers to the docket of the bankruptcy court adversary proceeding brought by Plaintiffs-Appellants, *Fjord et al. v. AMR Corp.*, Case No. 13-01392 (Bankr. S.D.N.Y.).

Application GRANTED. The six documents referenced above shall be included in the record on appeal.

The Clerk of Court is directed to terminate the motion at docket entry 29.

Dated: June 23, 2021
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE